

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FILED ELECTRONICALLY

CELTIC WOMAN LTD.,

Plaintiff,

- against -

CELTIC THUNDER LTD.,

CELTIC MAN LTD., SHARON

BROWNE, WLIW LLC,

ALIGN ENTERTAINMENT LLC

and GUSTAVO SAGASTUME

Defendant.

No 08-CV-0066 (TPG)

DECLARATION OF TERREL CASS

1. I am President and General Manager of WLIW LLC ("WLIW"), also known as Channel 21, a public broadcasting station in the New York area. I make this declaration on personal knowledge, and in reliance on the business records of WLIW, in opposition to the plaintiff's motion for a preliminary injunction.

2. This lawsuit relates to "Celtic Thunder," a musical show featuring an all-male cast of Irish singers and produced by Sharon Browne. WLIW plans to broadcast a television show of "Celtic Thunder" in March 2008. I understand that plaintiff Celtic Woman Ltd. is asking the court to enjoin WLIW from referencing either CELTIC MAN or CELTIC WOMAN in association with the "Celtic Thunder" program.

3. The program to be broadcast on WLIW originally was to be called "Celtic Man in Celtic Thunder," but CELTIC MAN no longer is used in connection with the

show, including in the title or in any promotional materials for the show. The show is now known and promoted simply as “Celtic Thunder.”

4. Certain promotional materials for the WLIW show formerly referred to Sharon Browne as “the original creator of Celtic Woman.” Any reference to CELTIC WOMAN, including any reference to Ms. Browne as its “creator” has since been removed from the “Celtic Thunder” broadcast and from promotional materials for the broadcast, including from the WLIW website.

5. Special editions of the “Celtic Thunder” CD and DVD will be made available as gifts to WLIW viewers who make financial pledges in support of our public television station. The artwork for the CD and DVD will not have any references to either CELTIC MAN or CELTIC WOMAN. True and correct copies of this artwork are attached to this declaration as Exhibit A. This artwork will not be changed.

6. Going forward, WLIW will not incorporate references to CELTIC MAN or CELTIC WOMAN into the broadcast or promotional materials. The only exception is that in interviews or biographical materials, WLIW may carry incidental references to the fact that Ms. Browne or others involved with CELTIC THUNDER formerly were involved with CELTIC WOMAN.

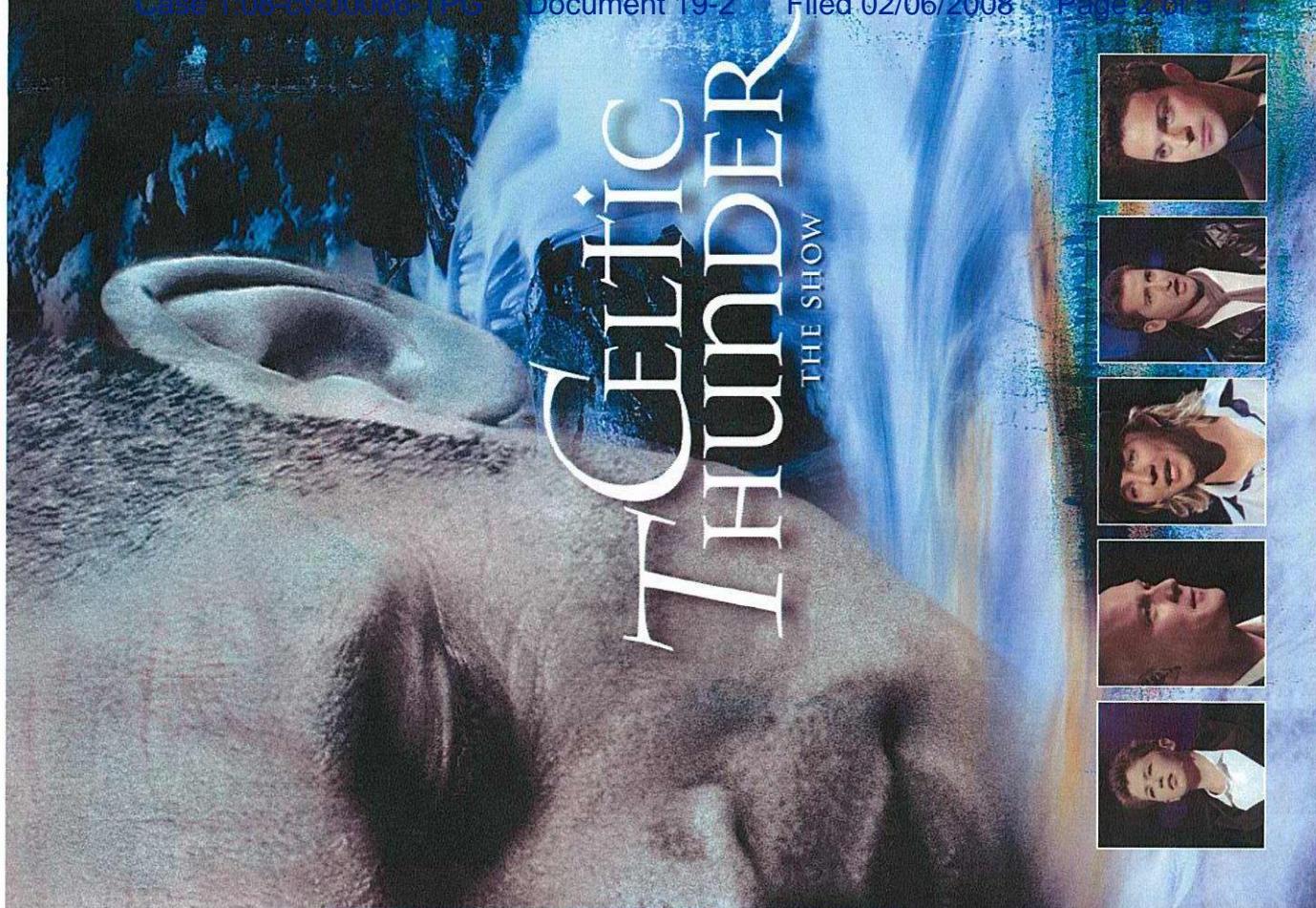
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I declare under penalty of perjury that the foregoing is true and correct.

Executed at PRAY, Montana this 6TH day of February, 2008.


Terrel Cass

Exhibit A



CELTIC THUNDER - THE SHOW

CTDVD 001P

WLW
Public Television Limited Edition
presented by

Public Television Limited Edition
presented by

1. Heartland
2. Mountains of Mourne
3. Raggle Taggle Gypsy
4. Ride On
5. Come By The Hills (Buachaill ón Eirne)
6. The Old Man
7. Love Thee Dearest
8. Heartbreaker
9. Nights in White Satin
10. A Bird Without Wings
11. The Voyage
12. The Island
13. Brothers In Arms
14. Mull of Kintyre
15. Puppy Love
16. Lauren & I
17. Steal Away
18. Remember Me (Recuerdame)
19. My Boy
20. Desperado
21. Ireland's Call
22. That's a Woman
23. She
24. Young Love
25. I Want To Know What Love Is
26. Cal/Ilocal Hero
27. Caledonia
- BONUS TRACKS**
28. Yesterday's Men
29. Christmas 1915



DAMIAN



GEORGE



KEITH



PAUL



RYAN



Exempt from Classification



© & © Celtic Thunder Limited



Celtic Thunder

THE SHOW

HEARTLAND (couler) Celtic Thunder Ltd.
Damian, George, Keith, Paul, Ryan

THE MOUNTAINS OF MOURNE (arr.couler) Celtic Thunder Ltd.
Keith

RAGGLE TAGGLE GYPSY (arr.couler) Celtic Thunder Ltd.
Damian, George, Keith, Paul, Ryan

RIDE ON (McCarthy) Universal/MCA Music Publishing
Ryan

COME BY THE HILLS
(BUACHAIL ÓN EIRNE) (arr.couler) Celtic Thunder Ltd.
Damian

THE OLD MAN (couler) Four Seasons Publishing (PES)
George

LOVE THE DEAREST (music PD arr. Coulier/Italian lyric Grant
Musker & Kabala) Celtic Thunder Ltd.
Paul

HEARTBREAKER (couler) Celtic Thunder Ltd.
Ryan

NIGHTS IN WHITE SATIN (Howard) Essex Music, Inc. (ASCAP)
Paul

A BIRD WITHOUT WINGS (couler/Chapman)
Mike Chapman Publishing Enterprises (ASCAP)/Four Seasons Publishing (PES)
Damian, George

THE VOYAGE (Duhon) Johnny Duhon Songs
George

THE ISLAND (Grady) Sandycroft Song admin. By Ten Ten Tunes (ASCAP)
Keith

BROTHERS IN ARMS (Kronfier) Almo Music Corp obo/o
Chariscourt Ltd. (ASCAP)
Ryan

MULUG OR KINTYRE (arr.couler) Celtic Thunder Ltd.
Damian, George, Keith, Paul, Ryan

PUPPY LOVE (Anka) Chrysalis Standards, Inc. (BMI)
Damian

LAUREN & I (Harkin) Celtic Thunder Ltd.
Keith

STEAL AWAY (couler) Four Seasons Publishing (PES)
Damian, George, Keith, Paul, Ryan

REMEMBER ME (RECUEURD'AME) (couler)
Four Seasons Publishing (PES)
Paul

MY BOY (Boutoyer/François/Dessal/Martin/Couler)
Colleges-EMI Music, Inc./EMI Music Publishing France S.A./
Copyright Control
George

DESPERADO (Henley/Frey)
Cass County Music / Red Cloud Music (BMI)
Ryan

IRELAND'S CALL (couler) Four Seasons Publishing (PES)
Damian, George, Keith, Paul, Ryan

THAT'S A WOMAN (couler) Celtic Thunder Ltd.
Paul, Ryan

SHE (Aznarou/Kretzner) Essex Music, Inc. (ASCAP)
Paul

YOUNG LOVE (Corey/Logue) Sony/ATV Songs LLC (BMI)
Damian

I WANT TO KNOW WHAT LOVE IS (Jones)
Somerset Songs Publishing, Inc. (ASCAP)
Keith

LOCAL HERO (Knopfler)
Almo Music Corp obo/o Chariscourt Ltd. (ASCAP)
Orchestral

CALEDONIA (arr. couler) Celtic Thunder Ltd.
Damian, George, Keith, Paul, Ryan

YESTERDAY'S MEN (couler/Martin)
Four Seasons Publishing (PES)
George

CHRISTMAS 1915 (McConnel) Copyright Control
Damian, George, Keith, Paul, Ryan

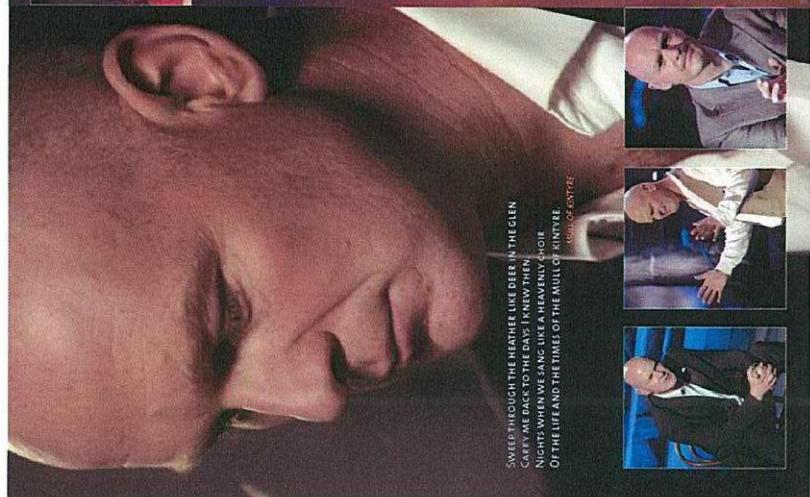
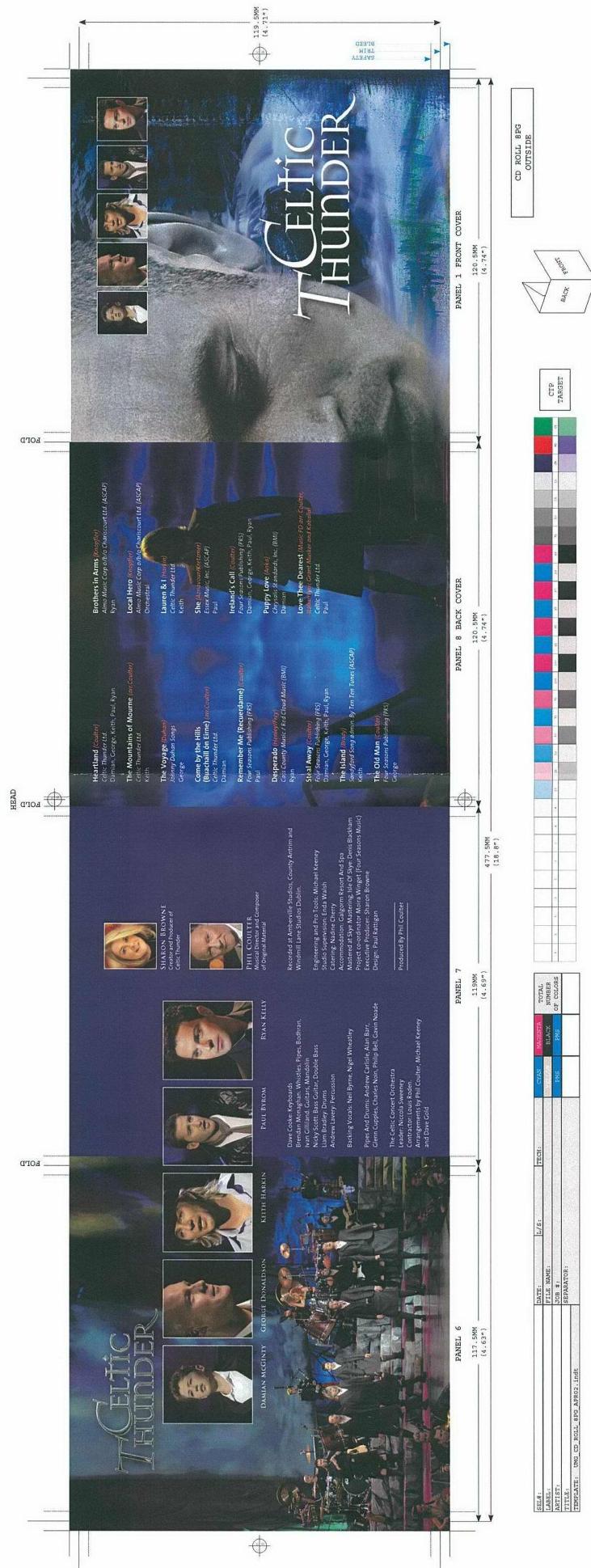
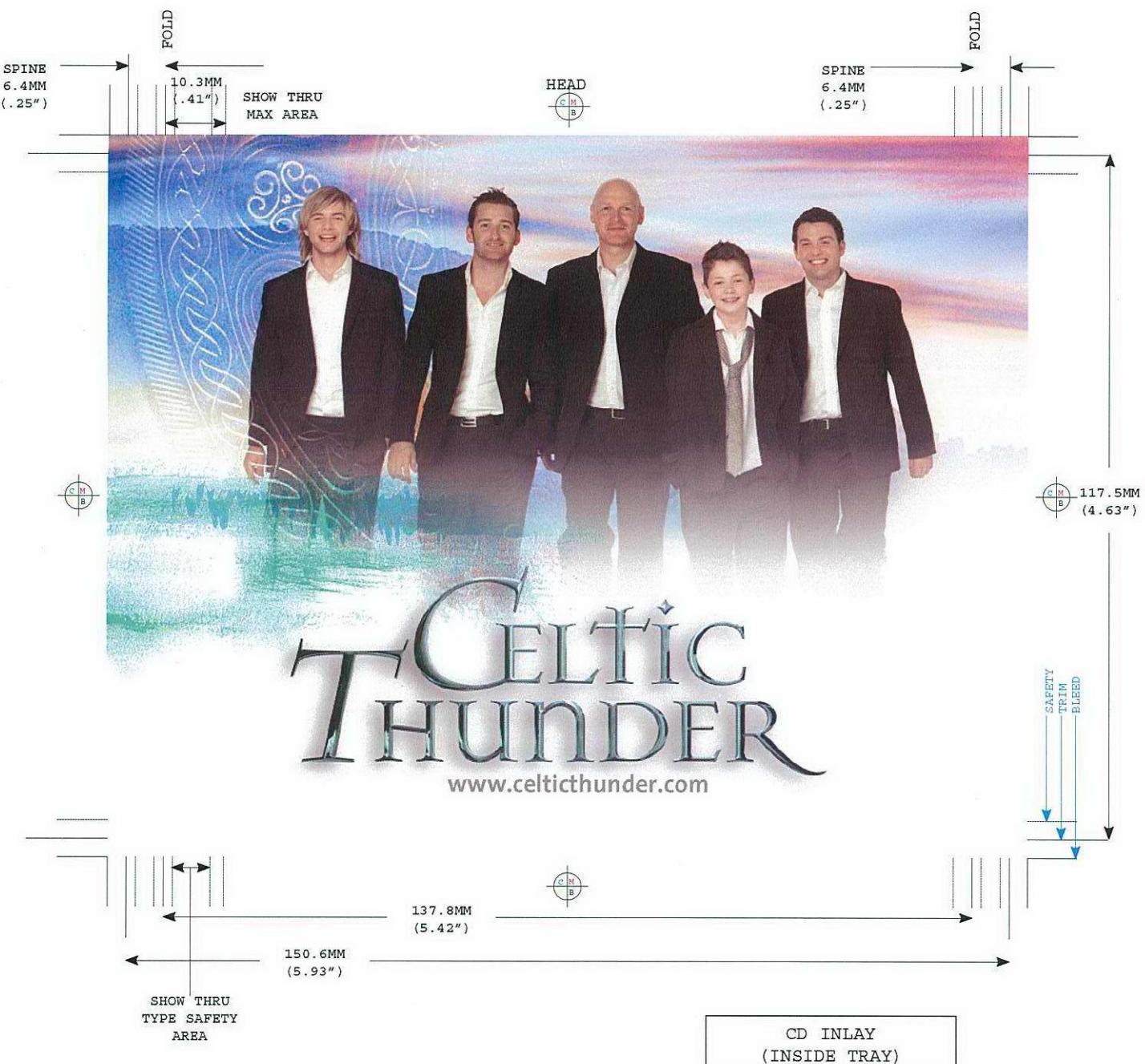




Exhibit A







SEL#:	DATE:	L/S:	TECH:	CYAN	MAGENTA	TOTAL NUMBER OF COLORS
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ARTIST:	JOB #:			PM2	PUS	
TITLE:	SEPARATOR:					
TEMPLATE: UMG CD INLAY CLEAR NOV02.indt						



CTP
TARGET



CD INLAY
(OUTSIDE TRAY)

SEL#:	DATE:	L/S:	TECH:	CYAN	MAGENTA	TOTAL NUMBER OF COLORS
LABEL:	FILE NAME:			BLACK	POST	
ARTIST:	JOB #:			EMB	POST	
TITLE:	SEPARATOR:					
TEMPLATE: UMG_CD_INLAY_NOV02.indt						

